

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Miami Division

JANE DOE,

Case No: 1:25-cv-20757-JB/Torres

Plaintiff,

vs.

STEVEN K. BONNELL II,

Defendant.

_____ /

**PLAINTIFF JANE DOE'S MOTION REQUESTING ORDER ON
MOTION FOR PROTECTIVE ORDER GOVERNING DISCOVERY**

COMES NOW Plaintiff Jane Doe, by and through the undersigned counsel, and respectfully states as follows:

1. On April 4, 2025, the Court entered a scheduling order in this matter. ("Order")(ECF23). The Order sets a deadline of October 16, 2025 for the parties' exchange of expert witness information, and a deadline of December 16, 2025 for the completion of all discovery.

2. On May 5, 2025, the parties exchanged written discovery requests. Meanwhile, Plaintiff, through counsel, attempted to reach an accord with Defendant on a stipulated confidentiality agreement and protective order governing discovery. Due to the highly sensitive nature of this matter which involves intimate sexual information and mental health information, a protective order is necessary to protect the privacy interests of both parties and of non-parties whose confidential and sensitive information may be produced. However, counsel for Defendant

DOE v BONNELL

1:25-cv-20757-JB

would not agree to any confidentiality protection for any witnesses, and only limited protection for Plaintiff. Thus, on May 23, 2025 Plaintiff had to file a Motion for Protective Order Governing Discovery. (“Motion”)(ECF 82). Defendant opposed the Motion (dkt. 92), and Plaintiff submitted her Reply on June 13, 2025 (ECF 98).

3. The parties’ answers to the written discovery requests were due on June 4, 2024. However, on June 2, 2025, in light of Plaintiff’s pending Motion, the parties agreed to a mutual extension of the written discovery response deadline until three (3) days after the Court rules on the Motion.

4. The expert witness and discovery deadlines are fast approaching.¹ Moreover, the parties had agreed to an October 1, 2025 deadline for all fact discovery which is no longer feasible. In order to prevent further delays and to allow fact discovery to proceed, the parties are in need of a ruling on the pending Motion.²

WHEREFORE, Plaintiff respectfully requests that this Honorable Court enter an order on Plaintiff’s Motion for a Protective Order Governing Discovery (ECF 82) so that fact discovery can proceed.

¹ Plaintiff is aware of Local Rule 7.1(b) pertaining to motions that have been pending for ninety (90) days or more. In regards to the Motion for Protective Order at issue here, the 90 days are not up until September 13th. However, due to the impending discovery deadlines, Plaintiff determined it was necessary to file the instant motion now rather than wait until the 13th.

² On August 12, 2025, Plaintiff reached out to Defendant via counsel to inquire if Defendant would be willing to join in this motion or else agree to not oppose it. Counsel for Defendant responded: “We take no position as to your proposed motion.” Presumably this means that the instant motion is unopposed.

DOE v BONNELL
1:25-cv-20757-JB

Respectfully submitted on this 2nd day of September, 2025.

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By: _____
CARLOS A. GARCIA PEREZ

CERTIFICATE OF CONFERRAL PURSUANT TO LOCAL RULE 7.1(a)(2)

I HEREBY CERTIFY that on August 12, 2025, counsel for movant made meet and confer efforts via email to opposing counsel regarding the relief sought in this motion but were unable to reach a resolution.



By: _____
CARLOS A. GARCIA PEREZ
Attorney for Plaintiff

DOE v BONNELL
1:25-cv-20757-JB

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 2, 2025 a true and correct copy of the foregoing
was served on all parties via the CM/ECF filing portal to all counsel of record.



By: _____
CARLOS A. GARCIA PEREZ
Attorney for Plaintiff